

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES,

Plaintiff,

v.

No. 23-20191

DEMETRIUS HALEY,

Defendant.

REPLY TO U.S. RESPONSE IN OPPOSITION (R. 141) TO MOTION TO
CHANGE VENUE (R. 131)

Comes now the defendant, Demetrius Haley, by and through his counsel of record, and replies to the U.S. response in opposition by incorporating the Motion to Change Venue filed by his co-defendant, Emmitt Martin, III, including the statistical survey. (R. 156). This survey demonstrates the prejudice which, in its response to his motion, R. 141, the government suggested was merely speculative because he didn't include a survey. The survey supporting Mr. Martin's motion applies with equal force to Mr. Haley, eliminating an argument the United States advanced in opposing a change of venue within the district.

WHEREFORE PREMISES CONSIDERED, Demetrius Haley prays this court grant his motion to change venue within the district.

Respectfully submitted,

S/Michael J. Stengel

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Certificate of Service

I hereby certify that I have served a copy of the foregoing Reply to U.S. Response in Opposition to Motion to Change Venue by electronic means, via the Court's electronic filing system, on AUSA's David Pritchard, Libby Rogers, Kathryn Gilbert, and Forrest Christian this 7th day of February, 2024.